

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13

Troy Thompson  
(DEBTOR) : Bankruptcy No. 18-11171AMC

**MOTION FOR CONTINUANCE OF THE STAY  
BEYOND 30 DAY PERIOD UNDER 11 U.S.C. §362**

1. Debtor has had one prior bankruptcy case as follows;  
Chapter 13 15-14725AMC  
Filed 7-2-16  
Confirmed 1-12-16  
Dismissed 12-5-17  
Attorney Cibik & Cataldo, PC
2. The case was dismissed by Trustee Motion for arrears.
3. Debtor owns no real estate, but is 50% owner of Garibaldi Property Management Construction, LLC which owns 3 properties with significant equity.
4. Debtor works for Jabari Productions and the corporation he has ownership interest in has rental income and is fixing up other properties for future rental and increased incomes.
5. Debtor's plan is \$600 per month, but Debtor's corporation is expecting refinancing that may allow him to pay off the Chapter 13 debt.
6. Debtor has minimal unsecured debt and this plan is intended to be a 100 percent plan to general unsecured.

WHEREFORE, Debtor prays that this Honorable Court enter an order extending the 30-day automatic stay.

Respectfully submitted,

Date: **February 23, 2018**

BY: /s/ Michael A. Cataldo  
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